

REMARKS

Per Examiner's 35.U.S.C.103(a) final rejection of claims 1-3, 5-12, 14, 16, 18, 20-21 and 23 over Rauber (US.6182053) in view of Woolston (US.5845265); claims 13, 17 and 22 over Rauber in view of Woolston and Durbin (US.6039258); and claim 4 over Rauber in view of Woolston and Kennedy (US.6301480), Applicants respectfully submit that all claims are arguably patentable over cited references, particularly independent claims 1, 11 and 20 (and claims dependent thereon) as last amended.

Applicants respectfully refer to the 5/24/2006 office action, specifically where Examiner appears to mis-apply cited references to teach or suggest all limitations of Applicants' invention, as follows:

1. RAUBER REFERENCE

On page 3, lines 18-23 of the final Office Action, Examiner argues that the Rauber reference teaches "visual object analyzer module" (i.e., by referring specifically to Rauber: col. 8, lines 62-67), and further that such reference teaches "neural network or simulation program for recognizing adaptively ... identified goods for real-time tracking ... multiple goods movement" (i.e., by referring specifically to Rauber: col. 10, lines 5-28).

However, Rauber (col. 8, lines 62-67) merely teaches remote viewing of retail orders entered via computer terminals and RF units (i.e., Rauber neither teaches nor suggests any visual analysis to recognize objects, as required by Applicants' claims.)

Moreover, Rauber (col. 10, lines 5-28) merely teaches inventory management method providing various sales options (i.e., Rauber neither teaches nor suggests any visual object analyzer module comprising a neural network or simulation program for recognizing adaptively identified goods for real-time tracking of multiple goods movement, as required by Applicants' claims.)

2. WOOLSTON REFERENCE

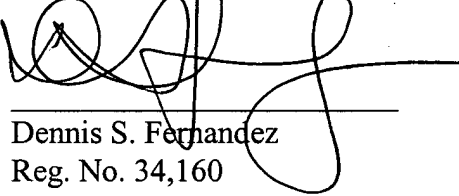
On page 3, lines 19-21 of the final Office Action, Examiner argues that the Woolston references teaches "visual-analyzer means...for recognizing adaptively the identified goods using a neural network or simulation program (generating the image of the watch for display)" (i.e., by referring specifically to Woolston: record 20 in Figure 13, further described in specification col. 15, lines 43-48.)

However, Woolston (Figure 13; col. 15, lines 43-48) merely teaches graphical user interface for displaying certain watch image from digital camera to terminal user (i.e., Woolston neither teaches nor suggests any visual object analyzer module comprising a neural network or simulation program for recognizing adaptively one or more identified goods for real-time tracking of multiple goods movement, as required by Applicants' claims.)

Accordingly based upon looking at the subject matter of the claimed invention as a whole, Applicants respectfully submit that one of ordinary skill in the art at the time of filing would not find obvious to combine Examiner's cited references, namely Woolston, Rauber, and/or any other prior art in the record, since none of such references teach or

suggest individually or in any combination all of the limitations defined Applicants in the claims, especially the essential and unobvious limitation of *visually analyzing objects using neural network or simulation program which recognizes adaptively identified goods to accomplish real-time tracking of multiple goods movement*. Applicants
5 respectfully request that Examiner reconsider rejection, since claims should be patentable.

Respectfully submitted,


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